

Hearing Date and Time: September 28, 2017 at 10:00 a.m. (Eastern Time)  
Objection Deadline: September 5, 2017 at 4:00 p.m. (Eastern Time)

**SAUL EWING LLP**

Sharon L. Levine  
Dipesh Patel  
555 Fifth Avenue  
Suite 1700  
New York, NY 10017  
Telephone: (212) 980-7200

*Attorneys for Ryan Goldberg*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
:  
In re : Chapter 11  
:  
Gawker Media LLC, *et al.*,<sup>1</sup> : Case No. 16-11700 (SMB)  
:  
Debtors. : (Jointly Administered)  
:  
-----X

**NOTICE OF RYAN GOLDBERG’S MOTION (I) TO ENFORCE ORDER  
CONFIRMING AMENDED JOINT CHAPTER 11 PLAN  
OF LIQUIDATION AND (II) TO BAR AND ENJOIN CREDITORS  
FROM PROSECUTING THEIR STATE COURT ACTION**

**PLEASE TAKE NOTICE** that on August 21, 2017, Ryan Goldberg (“Goldberg”), filed the attached *Motion (I) to Enforce Order Confirming Amended Joint Chapter 11 Plan of Liquidation and (II) to Bar and Enjoin Creditors from Prosecuting their State Court Action* (the “Motion”), which includes the reasons underlying the relief requested.

**PLEASE TAKE FURTHER NOTICE** that a hearing (the “Hearing”) on the relief requested in the Motion will be held before the Honorable Stuart M. Bernstein, in the United

---

<sup>1</sup> The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Kinja Kft. (5056). Gawker Media LLC and Gawker Media Group, Inc.’s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10020. Kinja Kft.’s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10020.

States Bankruptcy Court for the Southern District of New York, One Bowling Green, Courtroom 723, New York, New York 10004 (the “Court”), on **September 28, 2017 at 10:00 a.m. (ET)**.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections (“Objections”) to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York (the “Local Bankruptcy Rules”), shall set forth the basis for the response or objection and the specific grounds thereon, and shall be filed electronically with the Court on the docket of *In re Gawker Media LLC*, Case No. 16-11700 (SMB), in accordance with General Order M-399 by registered users of the Court’s case filing system (the User’s Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Court), with a hard copy to be delivered directly to chambers pursuant to Local Bankruptcy Rule 9070-1, and served so as to be actually received no later than **September 5, 2017 at 4:00 p.m. (ET)** (the “Objection Deadline”), upon: (i) the Debtors, Gawker Media LLC, c/o Opportune LLP, 10 East 53rd Street, 33rd Floor, New York, NY 10022, Attn: William D. Holden, Chief Restructuring Officer (WHolden@opportune.com); (ii) counsel for the Debtors, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036, Attn: Gregg M. Galardi, Esq. (Gregg.Galardi@ropesgray.com), Michael S. Winograd, Esq. (Michael.Winograd@ropesgray.com) and Kristina K. Alexander, Esq. (Kristina.Alexander@ropesgray.com); (iii) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, NY 10014, Attn: Greg M. Zipes, Esq. and Susan Arbeit, Esq.; (iv) the Internal Revenue Service, 2970 Market Street, Philadelphia, PA 19104, Attn: Centralized Insolvency Operation (mimi.m.wong@irsounsel.treas.gov); (v) the United States Attorney for the Southern District of

New York, 86 Chambers Street, 3rd Floor, New York, NY 10007, Attn: Bankruptcy Division (David.Jones6@usdoj.gov; Jeffrey.Oestericher@usdoj.gov; Joseph.Cordaro@usdoj.gov; Carina.Schoenberger@usdoj.gov); (vi) counsel to the Official Committee of Unsecured Creditors, Simpson Thacher & Bartlett, 425 Lexington Avenue, New York, NY 10017, Attn: Sandeep Qusba, Esq. (squsba@stblaw.com) and William T. Russell, Esq. (wrussell@stblaw.com); (vii) counsel to US VC Partners, LP, as Prepetition Second Lien Lender, Latham & Watkins LLP, at both 330 North Wabash Avenue, Suite 2800, Chicago, IL 60611, Attn: David S. Heller (david.heller@lw.com) and 885 Third Avenue, New York, NY 10022, Attn: Keith A. Simon, Esq. (keith.simon@lw.com); (viii) counsel to Cerberus Business Finance, LLC, as DIP Lender, Schulte Roth & Zabel, LLP, 919 Third Avenue, New York, NY 10022, Attn: Adam Harris, Esq. (adam.harris@srz.com) and Frederic Ragucci, Esq. (frederic.ragucci@srz.com ); (ix) Harder Mirell & Abrams LLP, 132 S. Rodeo Dr., Suite 301, Beverley Hills, CA 90212, Attn: Charles J. Harder, Esq. (charder@hmafirm.com); (x) Randall Busack (aka RJ Bell), c/o Harder Mirell & Abrams LLP, 132 S. Rodeo Dr., Suite 301, Beverley Hills, CA 90212, Attn: Charles J. Harder, Esq. (charder@hmafirm.com); and (xi) Pregame LLC dba Pregame.com, 5860 S. Pecos Rd. #400, Las Vegas, NV 89120, Attn: Randall J. Busack; and (xii) those persons who have formally appeared and requested service in these cases pursuant to Bankruptcy Rule 2002.

**PLEASE TAKE FURTHER NOTICE** that a copy of the Motion and copies of all other documents filed in the chapter 11 cases may be obtained free of charge by visiting the website of Prime Clerk LLC at <http://cases.primeclerk.com/gawker>. You may also obtain copies of any pleadings by visiting the Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

**PLEASE TAKE FURTHER NOTICE** that if no Objections to the Motion are timely filed and served in accordance with this notice, the Court may, following the Objection Deadline, enter the proposed order submitted by Goldberg, granting the Motion, with no further notice or opportunity to be heard.

**PLEASE TAKE FURTHER NOTICE** that the Hearing may be continued or adjourned from time to time without further notice other than an announcement of the adjourned date or dates at the hearing.

**PLEASE TAKE FURTHER NOTICE** that objecting parties are required to attend the Hearing and failure to appear may result in relief being granted or denied upon default.

Dated: August 21, 2017

**SAUL EWING LLP**

By: /s/ Sharon L. Levine  
Sharon L. Levine  
Dipesh Patel  
1037 Raymond Boulevard  
Suite 1520  
Newark, NJ 07102  
Telephone: (973) 286-6713  
Facsimile: (973) 286-6821  
[slevine@saul.com](mailto:slevine@saul.com)  
[dpatel@saul.com](mailto:dpatel@saul.com)

-and-

555 Fifth Avenue  
Suite 1700  
New York, NY 10017  
Telephone: (212) 980-7200

*Attorneys for Ryan Goldberg*